

EXHIBIT 17

Pages 1-235
Exhibits 1-18

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

No. 1:17-cv-00129-MR-DLH

RICHARD L. CAMPBELL,
Plaintiff,

v.

SHIRLEY TETER and SINCLAIR COMMUNICATIONS, INC.,
Defendants.

No. 1:17-cv-00256-MR-DLH

SHIRLEY TETER,
Plaintiff,

v.

PROJECT VERITAS ACTION FUND, et al.,
Defendants.

DEPOSITION OF JOANNE COMERFORD
TAKEN NOVEMBER 30, 2018
AT NORTHAMPTON DISTRICT COURT
15 GOTHIC STREET
NORTHAMPTON, MASSACHUSETTS

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(888) 800-9656 (866) 819-2317 fax

1 A. That is correct.

2 Q. And the idea of creating an e-mail to
3 MoveOn members originated with you and your
4 colleagues and not with Shirley Teter, true?

5 A. That is correct.

6 Q. And Exhibit 9 which has been shown to
7 you, but I don't think the second page was shown to
8 you. I think it's page 224. Would you look at
9 that, please?

10 A. Sure. We are just digging it out now.

11 Q. Thank you. Tell me when you have it,
12 please.

13 A. I have it.

14 Q. You can browse as much of the pages you
15 would like, and in fact, I invite you to read it all
16 I'm just curious about the part at the very bottom
17 of the page. After you review that, does that
18 refresh your recall of when you first drafted the
19 e-mail?

20 A. No, not specifically. Not this one.
21 You know, I linked the e-mail in a couple of these I
22 think.

23 Q. Okay. But at the very bottom of that
24 document, I believe that you attached a draft of the

1 A. Yes.

2 Q. And you found none?

3 A. I didn't find a signed release.

4 Q. Okay. Do you know if the release
5 that's referenced that's attached to Mr. Bernard's
6 e-mail to you and your colleagues was a blank
7 release or a signed release?

8 MR. MONTECALVO: Objection. Asked
9 and answered.

10 Q. When you looked for e-mail?

11 MR. MONTECALVO: Objection.

12 Q. When you looked through your e-mail?

13 A. It was a blank release.

14 Q. And releases are important to MoveOn,
15 correct?

16 A. They are very important.

17 Q. Ms. Comerford, we do not have a record
18 of you asking Shirley Teter for approval of the
19 final draft of the e-mail or the final draft of the
20 video. Can you explain why there is no available
21 communication to Ms. Teter asking for her approval?

22 A. Well, because it was verbal. The video
23 was a signed release that Randy had, which we cannot
24 see anymore because, in fact, our e-mails are